

Removing the "established business relationship" qualification from the fax regulations is absolutely bad for business, forcing associations and other companies to obtain the written consent of their own members, clients and industry partners before transmitting any fax that could be interpreted as commercial in nature is onerous. The association community has already raised numerous concerns about the new regulations that remain a subject of speculation, including exactly which transmissions the FCC would interpret as commercial in nature, whether written consent to a national association would extend to chapter or affiliate faxes, and whether a written consent form would expire with membership. Because we are a funeral association, will it be considered as commercial if we send a "death notice" notifying our members that another member has died? Can our non-profit organization send fax notifications for continuing education classes without written permission in advance, even though we are charged with providing that education? This is over-kill and way beyond the scope of the problems you were trying to solve. Have you had even one complaint from any business or individual concerning the faxes they receive from the associations that they are members of? I thought not!!